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PRODUCT NAME(S) Dibrom-14C (conc.)/Naled (Tech.)											
COMPANY NAME Chevron Chem. Co.											
SUBMISSION PURPOSE											
CHEMICAL FORMULATION											
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Naled

100 Pesticide Label Information

100.2 Formulation Information

Naled (91.6% Technical); Dibrom 14C (85% technical Naled)

101 Physical and Chemical Properties

101.1 Chemical Name

1,2 dibromo - 2, 2 dichloroethyl dimethyl phosphate

101.3 Common Name

Naled, dibrom

103 Toxicological Properties

103.2 Minimum Requirements

103.2.4 Aquatic Invertebrate LC 50

Daphnia magna 48 hr LC50 Naled 0.0003 mg/l Dibrom 0.0005 mg Naled/l

107 Conclusions

107.4 Data Adequacy Conclusions

Both studies, on technical Naled and on Dibrom 14C, are scientifically sound and show that both compounds are very highly toxic to aquatic invertebrates. However, it is the EEB's understanding that the percent active ingredient of Dibrom 14C is 85% Naled by weight. However, the sample used in the study for the formulated product is reported to contain 82.6% Naled; therefore, this study will be considered supplementary until the rationale for using the lower percent active ingredient is known. The study using technical grade Naled, however, does fulfill the requirement for an aquatic invertebrate acute LC₅₀.

Appendix: Data Evaluation Record (Naled)
Data Evaluation Record (Dibrom 14C)

Carol Matti Natella Wildlife Biologist

Carel matte natella

Ecological Effects Branch/HED

Richard Balcomb Wildlife Biologist

Ecological Effects Branch/HED

Clayton Bushong

Chief

Ecological Effects Branch/HED

December 4, 1979

48-hour aquatic invertebrate LD50 using Dibrom 14C Wildlife Biology, Section #1, EEB, HED

Mr. William H. Miller

THRU: Mr. Raymond Matheny, Section Head

THRU: Mr. Clayton Bushong, Chief, Ecological Effects Branch, HED

In response to the letter of November 14, 1979 from L.R. Stelzer of Chevron Chemical Company, we concur with his opinion that repeating the LD_{50} Daphnia study using Dibrom 14C is not justified.

According to the information supplied by the registrant, the sample used in the study was reported to contain 82.6% Naled instead of 85%. We therefore calculated a deficiency of only 2.4%, instead of the 2.8% reported in Stelzer's letter.

Carol M. Natella Carol M. Natella

C.Natella: emg 12-12-79 TS-769, CM2, RM807, (77725)



Chevron Chemical Company

940 Hensley Street, Richmond, CA 94804

November 14, 1979

DIBROM 14 Concentrate EPA Reg. No. 239-1721 Daphnia LD₅₀ Study

Mr. William H. Miller
Product Manager (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767)
Environmental Protection Agency
Waterside Mall, East Tower
Washington, D.C. 20460

Dear Mr. Miller:

Your letter of November 5, 1979 concerning the acute LD_{50} study with <u>Daphnia</u> conducted with DIBROM 14 Concentrate which was under guarantee has been received. The product contains 85% naled. The sample used for this toxicology test was found to contain about 2.8% less than guarantee and should not have been used for this test.

We believe that since the naled technical study was found to be acceptable, and also that the 2.8% deficiency for the 14C is not likely to appreciably affect the results obtained in the <u>Daphnia</u> test, that we are hardly justified in repeating this study with a correct sample of 14C at this time.

We appreciate your having brought this to our attention.

Yours very truly,

L. R. Stelzer, Manager

Registrations and Regulatory Affairs

JPT: db

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William H. Miller Product Manager (16) Insecticide-Rodenticida Branch egistration Division (TS-767)

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